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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	CC Docket No. 96-45
Federal-State Joint Board on)	CC Docket No. 97-160
Universal Service.)	APD No. 98-1
)	DA 98-1055

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation ("Sprint") respectfully submits the following replies to the June 25, 1998 comments offered by AT&T and MCI (referred to jointly herein as the "HAI sponsors") in response to the universal service cost studies conducted by various states.

In the Public Notice calling for comments in this proceeding, the Bureau explained that it sought comment on "whether the cost studies submitted by individual states meet the Commission's specified criteria."¹ Rather than responding to this request, the HAI sponsors took this opportunity to engage in a diatribe repeating the same baseless allegations against the Benchmark Cost Proxy Model ("BCPM") they have levied during the past year in proceedings before this Commission, as well as before many state commissions -- which have rejected these same arguments. In order to maintain the integrity of the record in

¹ DA 98-1055. Public Notice released June 4, 1998.

this proceeding, Sprint shall briefly respond to these claims, point by point, as they relate to the Commission's specific criteria for cost models.

Claim: BCPM does not identify customer location.

Response: Obviously this claim is false. BCPM locates customers at the Census Block level, as provided for in the Commission's criteria – which is the lowest level possible using publicly available data. Locations within CBs are further targeted using the CB's road network – which again, is publicly available information.

By contrast HAI depends on proprietary information, which, by its sponsors own admission, fails to locate 85 percent of customers in areas relevant to the universal service program, low-density areas. For the remaining 15 percent (of low density customers), it has been demonstrated that customer locations are discarded by the HAI model and thus ignored in the construction of outside plant. Thus, while the HAI preprocessing may technically identify customer location, the model itself does not use that information in the development of outside plant and its associated costs. Consequently, Sprint must question the value added by identifying customer location only to have that information ignored when developing the important network construction and costs.

The allegation that BCPM has not provided evidence supporting its practice of distributing population along roads is also flawed. The BCPM sponsors have provided to the Commission statistical measures showing the high correlation between road mileage and population distribution. The strength of this correlation lies in the fact that an area's entire population is distributed over an entire road network. To distort this distribution (as suggested by the HAI sponsors) weakens the validity of the statistical relationship.

Claim: BCPM does not use information of customer clustering to design loop plant.

Response: First, it should be noted that the concept of clustering is a "criteria" created entirely by MCI – the use of clustering has not been required by the Commission in the development of a cost model. In any event, it should not be assumed that clustering is the only efficient way for a model to create efficient carrier serving areas ("CSAs"). The BCPM's ultimate grids are designed to incorporate both engineering constraints and demand concerns in the creation of efficient CSAs.

Although the HAI clusters purport to be created using CSA criteria, the subsequent manipulation and distortion of these clusters - in which HAI freely engages - forces one to question the efficacy of any CSA criteria built into the original clustering algorithm.

Claim: BCPM uses an excessive number of DLCs.

Response: The BCPM constructs the same DLC-based technologies in urban, suburban and rural areas. In contrast, the HAI model uses DLCs to serve urban and suburban customers, but opts for an inferior T-1 repeater technology when serving isolated customers in rural areas. Serious questions have been raised as to the ability of this T-1 repeater technology to provide the capabilities for advanced services. Consequently, the HAI model defeats completely congressional intent as set forth in Section 254 of the Act since adopting the HAI technology would widen the gulf between the quality of service available to urban and rural customers.

Claim: BCPM creates too many serving areas by artificially constraining their size.

Response: This point, based on the difference of opinion regarding a 12,000 vs. 18,000 feet constraint, has been argued *ad nauseam*. Thus Sprint will not engage in further repetition here, other than to say that it continues to believe that 12,000 feet is the correct measure to be used to determine the size of CSAs.

It should be noted as well that when, as an exercise, the Commission required the HAI model to convert from 18,000 feet to 12,000 feet, the number of HAI CSAs increased dramatically, demonstrating that the primary issue is not how many CSAs exist, but rather whether 12,000 or 18,000 feet is the appropriate constraint. Sprint looks forward to the Commission's decision on this point.

Claim: BCPM produces inefficient feeder.

Response: The BCPM is the only proxy model before the Commission that optimally designs feeder routing. Given this fact, Sprint is puzzled as to the basis for this claim. The BCPM pre-processing examines different feeder layouts for every wire center and in every case chooses the shortest route based on population characteristics and other variables. This may include "steering" or "splitting" the feeder when appropriate. In contrast, HAI's attempt in "steering" feeder involves nothing more than applying a factor to a distance. The HAI sponsors' claim that feeder routes could be shorter is, therefore, without basis in fact.

Claim: BCPM's distribution design produces incorrect amounts of plant.

Response: The HAI sponsors claim, at various points in their comments, that the BCPM both underbuilds and overbuilds distribution plant. HAI purports that the alleged underbuilding results from moving customer locations, while the alleged overbuilding is the result of using square lots. The fact that HAI cites this as a problem is particularly curious given recent evidence that HAI's algorithms and pre-preprocessing systematically move customer locations literally tens of thousands of feet thereby understating the amount of cable required to serve customers whose locations are, according to HAI, known and used. Because of the size constraints placed on ultimate grids (discussed at

length in HAI's comments), and the size of quadrants within ultimate grids, it is physically impossible to move any customer within a BCPM quadrant the distance HAI customers are moved regularly – a fact that effectively moots HAI's claims on this point.

With respect to the assertion that square lots cause overbuild, Sprint maintains that square lots represent an effective average of all possible lot shapes and configurations. In contrast, HAI's lots are all rectangular and cable is assumed to run along the shortest sides. This results, of course, in minimizing the cable built to serve customers, whether such minimization is realistic or not. Sprint certainly agrees that efficient network layout is essential for proper forward-looking cost estimation; however, any model that makes such unrealistic assumptions (all rectangular lots served from shortest side) for the sake of obtaining allegedly lower costs is possibly agenda-driven and certainly not reality-based.

Claim: BCPM's switching is not forward-looking because it uses host-remote specifications found in the LERG.

Response: Fundamentally, this issue is an example of the HAI's sponsors' continued insistence that what currently exists cannot be forward-looking. Specifically, the existing host-remote configuration found in the LERG allegedly cannot be forward-looking because it is in use today. Interestingly, while dismissing the current host-remote assignment, the HAI sponsors have never

offered an alternative to the host-remote configuration found in the LERG, but have merely been content to offer users the option of creating their own configuration.

Sprint strongly believes the LERG represents the expertise and accumulated knowledge of engineers regarding the appropriate and efficient assignment of hosts and remotes. Summarily dismissing its usefulness because it preceded HAI is shortsighted at best – especially when HAI does not have a better or more useful suggestion.

Claim: BCPM's switching costs are based on a closed, proprietary process.

Response: Sprint is perplexed by this particular claim. While it is true that BCPM utilizes information that comes from Bellcore's SCIS model, it is not true that the process is unavailable to the HAI sponsors and other interested parties. On May 15, 1998, Sprint provided both the HAI sponsors and the Commission with information from Bellcore describing the availability of SCIS for public review. HAI's claim on this point is, therefore, moot and thus requires no further comment.

Sprint notes, however, that the entire HAI loop module (pre-processing, feeder and distribution modules) does, in fact, depend entirely on what its own sponsors have claimed to be proprietary information. As previously requested by Sprint, HAI should make its complete set of underlying geocoded data available to all parties in an unrestricted fashion.

Claim: BCPM fails to calculate signaling costs.

Response: Once again, MCI has, on its own, created what it refers to as a Commission criteria. MCI states that BCPM is in conflict with Commission criteria number 2 because it does not explicitly model signaling costs. Criteria number 2 states that “any network function or element must...have an associated cost.” The BCPM does include costs for signaling. In general, signaling represents a minute fraction of the average cost of basic telephone service (averaging one-half of one percent in rural areas). Therefore, rather than expending valuable resources calculating such a small percentage of costs, BCPM, using a streamlined approach to signaling, focuses on those elements that account for the overwhelming majority of the costs of basic service, such as switching and the loop.

Claim: The states are wrong to have used what the HAI sponsors refer to as “embedded inputs”.

Response: In making this claim, MCI has clearly misinterpreted the definition of economic cost, as set forth at footnote 573 of the Commission’s May 8, 1997 Order. There the Commission defined forward-looking economic cost as “the cost of producing services using the least cost, most efficient and reasonable technology currently available for purchase with all inputs valued at current prices” (emphasis added). This succinct statement of Commission intent makes it clear that the HAI sponsors are mistaken when they find fault with a state that


has used actual input prices in its cost study (see MCI at p. 26). Moreover, the technology built into the BCPM does not replicate any existing firm's technology or plant layout. Therefore, MCI's claim that the cost studies of those states choosing BCPM do not reflect an underlying, forward-looking technology is incorrect.

Lastly with regard to inputs such as structure sharing, MCI has once again made unrealistic assumptions in the name of "efficiency". There is no reason to assume that a structure sharing arrangement for a network built in a given market tomorrow will differ significantly from a structure sharing arrangement that exists in that same market today (since the concept of 'scorched node' as incorporated into a proxy model applies only to the telephone network and not to neighboring utilities). For example, as the Kentucky Public Service Commission has pointed out, "The buried drop sharing function selected [for use] is 85 percent for all density zones. The default value for the HAI Model is 50 percent for all density zones. The default value, which represents two entities sharing a common trench, cannot reasonably be expected in current and future networks." (Administrative Case No. 360, Order released May 22, 1998 at p. 22).

CONCLUSION

The issues raised by MCI and AT&T in their comments are clearly without merit and should be summarily rejected by the Commission.

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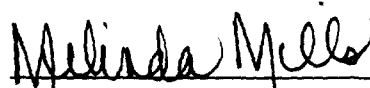
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CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 9th day of July 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation" in the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, CC Docket No. 97-160, APD No. 98-1, DA 98-1055, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.



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